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SCHLUMBERGER TECHNOLOGY CORPORATION

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

E-FILED - 7/6/06

MEMRY CORPORATION

Plaintiff,

v.

KENTUCKY OIL CORPORATION, N.V.,
PETER BESSELINK, MEMORY METALS
HOLLAND, B.V.,

Defendant.

KENTUCKY OIL TECHNOLOGY, N.V.,

Counterclaimant,

MEMRY CORPORATION and
SCHLUMBERGER TECHNOLOGY
CORPORATION,

Counterdefendants.

) Case No. CV-04-03843 RMW (HRL)
)
) **STIPULATION AND ~~PROPOSED~~**
) **ORDER EXTENDING TIME TO**
) **RESPOND TO WRITTEN DISCOVERY**
) **AND FILE MOTIONS TO COMPEL**

STIPULATION EXTENDING TIME TO RESPOND TO WRITTEN
DISCOVERY AND FILE MOTIONS TO COMPEL
CASE NO. CV-04-03843 RMW (HRL)

1 WHEREAS, at the Case Management Conference held on April 28, 2006, the Court
2 directed the parties to complete all outstanding written discovery by June 16, 2006 and to file
3 any motions to compel related to outstanding discovery by June 30, 2006; and

4 WHEREAS, certain unforeseen events have prevented the parties from completing all
5 outstanding discovery;

6 IT IS HEREBY STIPULATED AND AGREED by and between the parties, pursuant to
7 Civil Local Rule 6-1(b), that 1) the date for completion of all outstanding written discovery
8 should be extended from June 16, 2006 to June 30, 2006 and 2) the deadline for filing any
9 motions to compel should be extended from June 30, 2006 to July 14, 2006.

10 This stipulation shall be without prejudice to any party seeking further extensions of time
11 from the Court.

12 DATED: June 22, 2006

Cantor Colburn LLP

13
14 By: /s/ Andrew J. Ryan
ANDREW J. RYAN
15 Attorneys for Plaintiff and Counterdefendant
MEMRY CORPORATION
16

17 DATED: June 22, 2006

Luce, Forward, Hamilton & Scripps LLP

18
19 By: /s/ Michael H Bierman
Michael H. Bierman
20 Attorneys for KENTUCKY OIL
TECHNOLOGY, N.V., PETER
21 BESSELINK and MEMORY METAL
HOLLAND B.V.
22

23
24 DATED: June 22, 2006

Foley & Lardner LLP

25
26 By: /s/ David B. Moyer
David B. Moyer
27 Attorneys for Counterdefendant
SCHLUMBERGER TECHNOLOGY
28 CORPORATION

1 Concurrence in the filing of this document has been obtained from Michael H. Bierman
2 and Andrew J. Ryan, the signatories listed above.

3 DATED: June 22, 2006

Foley & Lardner LLP

4
5 By: /s/ David B. Moyer

6 David B. Moyer

7 Attorneys for Counterdefendant

SCHLUMBERGER TECHNOLOGY

CORPORATION

8
9 **ORDER**

10 Pursuant to Stipulation, IT IS HEREBY ORDERED that 1) the date for completion of all
11 outstanding written discovery shall be extended from June 16, 2006 to June 30, 2006 and 2) the
12 deadline for filing any motions to compel shall be extended from June 30, 2006 to July 14, 2006.

13 Dated: 7/6/06

/s/ Ronald M. Whyte

14 Ronald M. Whyte

15 United States District Court Judge